

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

**CLIFFORD BOYNES, et al.,**

**Plaintiffs,**

**v.**

**LIMETREE BAY VENTURES, LLC, et  
al.,  
Defendants.**

**Civil Action No. 2021-0253**

**HELEN SHIRLEY, et al.,**

**Plaintiffs,**

**v.**

**LIMETREE BAY VENTURES, LLC, et  
al.,  
Defendants.**

**Civil Action No. 2021-0259**

**MARY L. MOOREHEAD, et al.,**

**Plaintiffs,**

**v.**

**LIMETREE BAY VENTURES, LLC, et  
al.,  
Defendants.**

**Civil Action No. 2021-0260**

**BEECHER COTTON, et al.,**

**Plaintiffs,**

**v.**

**LIMETREE BAY VENTURES, LLC, et  
al.,  
Defendants.**

**Civil Action No. 2021-0261**

**DEFENDANTS' MOTION TO EXTEND PRETRIAL DEADLINES SIX MONTHS**

Pursuant to Fed. R. Civ. P. 16(b)(4), Defendants Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals ("Terminals"), Limetree Bay Ventures, LLC, EIG Global Energy Partners, LLC, Pinnacle Services, LLC, Versa Integrity Group, Inc., National Industrial Services, LLC, BP Products North America, Inc., and Universal Plant Services (VI), LLC (collectively "Defendants"), by and through undersigned counsel, hereby submit their Motion to Extend Pretrial Deadlines Six Months. This Motion is supported by the accompanying Memorandum of Law in Support of Defendants' Motion to Extend Pretrial Deadlines Six Months. For the reasons more fully set forth in the Memorandum, good cause exists to extend the pretrial deadlines by six (6) months and Defendants' Motion should be Granted. A proposed Order is submitted herewith.

Respectfully submitted,

**Beckstedt & Kuczynski LLP**

Dated: February 25, 2025

/s/ Carl A. Beckstedt III  
Carl A. Beckstedt III, Esq.  
VI Bar No. 684  
Beckstedt & Kuczynski LLP  
2162 Church Street  
Christiansted, St. Croix  
U.S. Virgin Islands 00820  
Tel: (340) 719-8086 / Fax: (800) 886-6831  
carl@beckstedtlaw.com

**Weinberg Wheeler Hudgins Gunn & Dial, LLC**

Dated: February 25, 2025

/s/ Shubhra R. Mashelkar  
Shubhra R. Mashelkar  
Ga. Bar No. 475388  
3344 Peachtree Road, NE  
Suite 2400  
Atlanta, GA 30326  
Tel: (404) 876-2600 / Fax: (404) 875-9433  
smashelkar@wwhgd.com  
*Admitted Pro Hac Vice*

*Attorneys for Defendant Limetree Bay Terminals,  
LLC*

Dated: February 25, 2025

*s/ Kenneth M. Klemm*

Kenneth M. Klemm (solely with respect to case nos.  
21-00253, 00260 & 00261, admitted *pro hac vice*)

Adam B. Zuckerman (solely with respect to case  
nos. 21-00253, 00259 & 00260, admitted *pro hac  
vice*)

BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.

201 St. Charles Avenue, Suite 3600

New Orleans, Louisiana 70170

Telephone: (504) 566-5200

kklemm@bakerdonelson.com

azuckerman@bakerdonelson.com

*and*

Amy L. Champagne (solely with respect to case nos.  
21-00253, 00259 & 00261, admitted *pro hac vice*)

BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.

One Eastover Center

100 Vision Drive, Suite 400

Jackson, Mississippi 39211

Telephone: (601) 351-8912

achampagne@bakerdonelson.com

*and*

Dated: February 25, 2025

*/s/ Adam N. Marinelli*

Adam N. Marinelli (V.I. Bar No. 1294)

BOLTNAGI PC

Merchants Financial Center

4608 Tutu Park Mall, Suite 202

St. Thomas, Virgin Islands 00802-1816

Telephone: (340) 774-2944

amarinelli@vilaw.com

*Attorneys for Defendants EIG Global Energy  
Partners, LLC and Limetree Bay Ventures, LLC*

Dated: February 25, 2025

By: /s/ Martin A. Shelton  
Scott Masterson (admitted *pro hac vice*)  
Martin A. Shelton (admitted *pro hac vice*)  
Keith Kodosky (admitted *pro hac vice*)  
Ke “Kim” Zhang (admitted *pro hac vice*)  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
600 Peachtree Street NE, Suite 4700  
Atlanta, Georgia 30308  
404.476.2009  
[Scott.Masterson@lewisbrisbois.com](mailto:Scott.Masterson@lewisbrisbois.com)  
[Martin.shelton@lewisbrisbois.com](mailto:Martin.shelton@lewisbrisbois.com)  
[Keith.Kodosky@lewisbrisbois.com](mailto:Keith.Kodosky@lewisbrisbois.com)  
[Kim.zhang@lewisbrisbois.com](mailto:Kim.zhang@lewisbrisbois.com)

And

Dated: February 25, 2025

By: /s/ Alex M. Moskowitz  
Alex M. Moskowitz (V.I. Bar No. 1072)  
DUDLEY NEWMAN FEUERZEIG LLP  
Law House  
1000 Frederiksberg Gade  
P.O. Box 756  
St. Thomas, VI 00804-0756  
Telephone: (340) 774-4422  
Cellular: (340) 513-7243  
E-mail: [amoskowitz@dnfvi.com](mailto:amoskowitz@dnfvi.com)

*Attorneys for Defendant Pinnacle Services, LLC*

**Michael L. Sheesley LLC**

Dated: February 25, 2025

/s/Michael L. Sheesley  
Michael L. Sheesley  
V.I. Bar #1010  
Condo Torre Del Mar, Apt 2201  
1477 Ashford Ave  
San Juan, PR 00907  
Telephone: (412)972-0412  
[michael@sheesley-law.com](mailto:michael@sheesley-law.com)

*Attorney for Defendant Versa Integrity Group, Inc.*

Dated: February 25, 2025

/s/Kevin F. D’Amour  
Kevin F. D’Amour, Esq., VI Bar No. 288  
BARNES, D’AMOUR & VOGEL  
P.O. Box 224589

St. Croix, VI 00822  
Tel: (340) 773-2785/Fax: 773-5427  
[kdamour@usvilawfirm.com](mailto:kdamour@usvilawfirm.com)

*Attorney for Defendant, National Industrial Services,  
LLC*

Dated: February 25, 2025

/s/ Chivonne A.S. Thomas  
Schuyler A. Smith (V.I. Bar No. 1271)  
Jennifer Miller Brooks (V.I. Bar No.  
1109) Chivonne A.S. Thomas (V.I. Bar  
No. 1168)  
**HAMILTON, MILLER & BIRTHISEL, VI  
P.C.**  
150 Southeast Second Ave, Ste. 1200  
Miami, Florida 33131  
Telephone: (305) 379-3686  
[ssmith@hamiltonmillerlaw.com](mailto:ssmith@hamiltonmillerlaw.com)  
[jmiller@hamiltonmillerlaw.com](mailto:jmiller@hamiltonmillerlaw.com)  
[cthomas@hamiltonmillerlaw.com](mailto:cthomas@hamiltonmillerlaw.com)

*and*

Dated: February 25, 2025

/s/ Robert T. Franciscovich  
Lori B. Leskin (admitted *pro hac vice*)  
Rhonda R. Trotter (admitted *pro hac  
vice*) Robert Franciscovich (admitted *pro  
hac vice*)  
**ARNOLD & PORTER KAYE SCHOLER LLP**  
250 West 55th Street  
New York, New York 10019  
Telephone: (212) 836-8000  
[lori.leskin@arnoldporter.com](mailto:lori.leskin@arnoldporter.com)  
[rhonda.trotter@arnoldporter.com](mailto:rhonda.trotter@arnoldporter.com)  
[robert.franciscovich@arnoldporter.  
com](mailto:robert.franciscovich@arnoldporter.com)

*Attorneys for Defendant BP  
Products North America, Inc.*

**CAMPBELL CONROY & O'NEIL, P.C.**

Dated: February 25, 2025

/s/ Michelle M. Byers  
James M. Campbell, *pro hac vice*  
Michelle M. Byers, *pro hac vice*

20 City Square, Suite 300  
Boston, MA 02129  
Tel: (617) 241-3052  
Fax: (617) 241-5115  
[jmcampbell@campbell-trial-lawyers.com](mailto:jmcampbell@campbell-trial-lawyers.com)  
[mbyers@campbell-trial-lawyers.com](mailto:mbyers@campbell-trial-lawyers.com)

**LAW OFFICES OF KARIN A. BENTZ, P.C.**

Dated: February 25, 2025

/s/ Karin A. Bentz  
Karin A. Bentz, V.I. Bar 413  
7605 Lower Hull  
St. Thomas, VI 00802  
Tel: (340) 774-2669  
[kbentz@virginlaw.com](mailto:kbentz@virginlaw.com)

*Attorneys for Defendant Universal Plant Services  
(VI), LLC*